## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	§	
	§	
HL BUILDERS, LLC f/k/a	§	CASE NO. 19-32825
CD HOMES, LLC,	§	
	§	(Involuntary Chapter 11)
ALLEGED DEBTOR	§	· · · · · · · · · · · · · · · · · · ·

## ANSWER TO INVOLUNTARY PETITION

TO THE HONORABLE EDUARDO V. RODRIGUEZ, UNITED STATES BANKRUPTCY JUDGE:

Comes now, HL Builders, LLC f/k/a CD Homes, LLC, the Alleged Debtor herein (the "Alleged Debtor") and files this Answer to the Involuntary Petition (the "Petition") filed by Petitioning Creditors HouTex Builders, LLC, 415 Shadywood, LLC, and 2203 Looscan Lane, LLC (the "Petitioning Creditors"), and in support thereof, would respectfully show this Court as follows:

- 1. Alleged Debtor admits the allegations contained in No. 1 of the Petitioning Creditors' Petition.
- 2. Alleged Debtor admits the allegations contained in No. 2 of the Petitioning Creditors' Petition.
- 3. Alleged Debtor admits the allegations contained in No. 3 of the Petitioning Creditors' Petition.
- 4. Alleged Debtor would show that its federal Employer Identification (EIN) is 43-2108992.
- 5. Alleged Debtor admits the allegations contained in No. 5 of the Petitioning Creditors' Petition.
- 6. Alleged Debtor is without sufficient information to either admit or deny the allegations contained in Paragraph 6 of the Petitioning Creditors' Petition. Therefore, for pleading purposes, those allegations are denied.

Alleged Debtor admits the allegations contained in No. 7 of the Petitioning 7.

Creditors' Petition.

Alleged Debtor admits the allegations contained in No. 8 of the Petitioning 8.

Creditors' Petition.

Alleged Debtor denies the allegations contained in No. 9 of the Petitioning 9.

Creditors' Petition.

Alleged Debtor admits the allegations contained in No. 10 of the Petitioning 10.

Creditors' Petition.

Alleged Debtor denies the allegations contained in No. 11 of the Petitioning 11.

Creditors' Petition.

Alleged Debtor is without sufficient information to either admit or deny the 12.

allegations contained in No. 12 of the Petitioning Creditors' Petition. Therefore, for pleading purposes, those

allegations are denied.

Alleged Debtor denies the allegations contained in No. 13 of the Petitioning Creditors' 13.

Petition. For further answer, the claims alleged by Petitioning Creditors are absolutely disputed.

WHEREFORE, PREMISES CONSIDERED, Alleged Debtor prays that the Court deny, dismiss.

and award appropriate damages against Petitioning Creditors and all officers, agents, and attorneys for the

damages sustained by the Alleged Debtor.

Dated: June 11, 2019

Respectfully submitted,

FUQUA & ASSOCIATES, PC

/s/ Richard L. Fugua BY:

Richard L. Fuqua

State Bar No. 07552300 5005 Riverway, Suite 250

Houston, TX 77056

2

(713) 960-0277 (713) 960-1064 facsimile rlfuqua@fuqualegal.com COUNSEL FOR Alleged Debtor

## CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with Charles Rubio, Movants' counsel, in a good faith attempt to resolve the dispute which is the subject of Movants' Motion. At this time, a hearing is required.

/s/ Richard L. Fuqua
Richard L. Fuqua

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Response was forwarded by email on June 11, 2019 to the parties listed below and to all parties registered to received notices by ECF.

Charles M. Rubio Michael D. Fritz Diamond McCarthy LLP 909 Fannin, Suite 3700 Houston, TX 77010

Ross Spence Carolyn Carollo Snow Spence Green LLP 2929 Allen Parkway, Suite 2800 Houston, TX 77019

> /s/ Richard L. Fuqua Richard L. Fuqua